

UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MASSACHUSETTS

MARIA ALEJANDRA CELIMEN SAVINO,  
*et al.*,

Petitioners-Plaintiffs,

v.

STEVEN SOUZA,

Respondent-Defendant.

Case No. 1:20-cv-10617-WGY

**PLAINTIFFS' ASSENTED-TO MOTION TO MODIFY PROTECTIVE ORDER**

Plaintiffs request that the Court modify its Stipulated Protective Order Regarding Confidential Information, ECF 39-1, 45. Plaintiffs conferred with opposing counsel by email on June 12, 2020, regarding Plaintiffs' proposed modification, *see* Local Rule 7.1, and Thomas Kanwit, attorney for Respondent, assented to Plaintiffs' proposed modification on June 12 by email.

The Stipulated Protective Order currently provides that Plaintiffs may not disseminate private medical information produced by Defendants "beyond the Counsel (including outside counsel) for the Parties, as defined to include associated personnel necessary to assist counsel in this Action...[and] to experts or consultants for the Parties." ECF 39-1. As currently worded, the Stipulated Protective Order prevents Plaintiffs' counsel from disclosing private medical records to the individual class members who are the subjects of those records. Accordingly, Plaintiffs, with Respondent's consent, seek to modify the Stipulated Protective Order to permit Plaintiffs' counsel to share medical records with the patient/class member who is the subject of those particular records.

All parties to this action hereby stipulate that they have agreed to the terms of the Modified Protective Order attached hereto, and they hereby submit said Protective Order to the Court for endorsement and docketing.

Dated: June 22, 2020

Respectfully Submitted,

/s/ Oren Sellstrom

Oren Nimni (BBO #691821)  
Oren Sellstrom (BBO #569045)  
Lauren Sampson (BBO #704319)  
Ivan Espinoza-Madrigal†  
Lawyers for Civil Rights  
61 Batterymarch Street, 5th Floor  
Boston, MA 02110  
(617) 988-0606  
onimni@lawyersforcivilrights.org

Grace Choi, Law Student Intern\*  
Kayla Crowell, Law Student Intern\*  
Aseem Mehta, Law Graduate\*  
Alden Pinkham, Law Graduate\*  
Daniel Phillips, Law Graduate\*  
Fernando Quiroz, Law Student Intern\*  
Bianca Rey, Law Student Intern\*  
Megan Yan, Law Graduate\*  
Reena Parikh†  
Muneer Ahmad†  
Michael Wishnie (BBO# 568654)  
Jerome N. Frank Legal Svcs. Org.  
P.O. Box 209090  
New Haven, CT 06520  
Phone: (203) 432-4800  
michael.wishnie@ylsclinics.org

Lisa Pirozzolo  
John Butts  
Vinita Ferrera  
Felicia Ellsworth  
Nicole M.F. Dooley  
Annaleigh Curtis  
Michael Brown  
Rama Attreya  
Gary Howell-Walton  
Mikalya Foster  
Elizabeth Driscoll  
Wilmer Cutler Pickering Hale and Dorr LLP  
60 State Street  
Boston, MA 021009  
Lisa.Pirozzolo@wilmerhale.com

† Admitted pro hac vice.

\* Motion for law student appearances pending.

**CERTIFICATE OF SERVICE**

I hereby certify that on June 22, 2020, the above-captioned document was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants.

/s/ Oren Sellstrom